



April 2, 2012

Mr. Khai M. Dao
USEPA Region 3
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• **Engineering**

• **Remediation**

• **Consulting**

Delivery via electronic-mail

**Re: EPA's Proposed Explanation of Significant Differences
Superior Tube Company, Collegeville, PA 19426**

Dear Mr. Dao:

Further to our recent telephone conversation, Environmental Alliance, Inc., on behalf of Superior Tube Company ("STC"), is pleased to submit the following comments clarifying certain items in the U.S. Environmental Protection Agency ("EPA") March 1, 2012 Proposed Explanation of Significant Differences (ESD) to the Final Decision and Response to Comments ("FDRTC") issued on September 30, 1993 for the STC Site.

As we have discussed, STC, EPA, and the Pennsylvania Department of Environmental Protection ("PADEP"), have agreed that all environmental remediation work to be performed at the Site moving forward will be done in accordance with the approved Act 2 Cleanup Plan, dated July 13, 2011 and the Response to Comments / Modification to Cleanup Plan letter, dated December 13, 2011 (collectively referred to as the "Final Cleanup Plan"). While the Proposed ESD does not contradict this approach, it also does not explicitly state that all work will be completed pursuant to the Final Cleanup Plan. As such, certain edits are proposed for clarity and to ensure consistency with the Final Cleanup Plan.

In accordance with the above, the following minor edits are proposed. For convenience, the original language in the Proposed ESD is provided in *italicized* text, and then immediately followed by the suggested changed language.

Proposed Changes to the ESD Document

1) Page 1, second paragraph, last sentence:

The FDRTC, as amended by this proposed ESD, will require the continued pumping and treating of groundwater and soil vapor extraction in northern recovery area unless it is determined to be technically impracticable to meet the MCLs for the COCs.

Proposed change (clarity regarding extent of DNAPL Area):

EPA has determined that the continued implementation of the ISVE and groundwater pump and treat systems selected in the FDRTC are not likely to achieve the MCLs for those COCs in the vicinity of well 4M in the northern recovery area (DNAPL Area) within a reasonable or foreseeable time frame due to technical impracticability from an engineering perspective.

5) Page 3, second to last paragraph, second sentence:

With respect to groundwater discharge to surface water and indoor air vapor intrusion, the existing groundwater monitoring program will confirm that the selected corrective measure is preventing the COCs from migrating out of the DNAPL Area.

Proposed change (clarity and consistency with Final Cleanup Plan):

With respect to groundwater discharge to surface water and indoor air vapor intrusion, the existing groundwater monitoring program will confirm that the selected corrective measure is preventing the COCs from migrating out of the DNAPL Area at concentrations that would cause an exceedance of SSSs at the point of compliance.

Superior Tube Company believes the minor changes presented above provide a clearer description of the Site conditions and approved cleanup strategy moving forward. Should you have any questions, please feel free to contact me at (302) 234-4400.

Sincerely,

ENVIRONMENTAL ALLIANCE, INC.

A handwritten signature in black ink, appearing to be 'JR' with a stylized flourish at the end.

Joseph Rossi
Project Manager

Cc: David Buzzell, Esq., Land Air Water Legal Solutions LLC
Richard Warden, Superior Tube Company